

# **EXHIBIT 6**

November 13, 2020

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1                   -- BRIAN STEVENS --

2       IN THE UNITED STATES DISTRICT COURT  
3       FOR THE SOUTHERN DISTRICT OF NEW YORK

4       ----- X  
5       ULKU ROWE,

6                   Plaintiff,

7                               Case No.  
8                               19 Civ. 08655 (LGS) (GWG)

9                   v.

10       GOOGLE LLC

11                   Defendant.

12       ----- X

13       DATE:   November 13, 2020

14       TIME:   9:42 A.M.

15                   VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16       OF BRIAN STEVENS, held via Zoom, pursuant to

17       Notice, before Hope Menaker, a Shorthand Reporter

18       and Notary Public of the State of New York.

-- BRIAN STEVENS --

Q. And so with respect to that direct experience within financial services organization, is there anyone who had more of that experience in Google Cloud than Ms. Rowe?

MR. GAGE: Objection.

A. In Cloud perhaps, but not that I'm aware of.

Q. Did you ever have any conversations with Mr. Grannis regarding Ms. Rowe's role specifically?

MR. GAGE: Objection.

A. Not that I recall specifically.

Q. Did you ever have any discussions with Mr. Grannis regarding Ms. Rowe's trajectory at the company?

MR. GAGE: Objection.

A. No, not that I recall.

Q. Did you have any conversations with Mr. Grannis regarding Ms. Rowe's performance?

A. Not that I recall.

Q. Did you have any conversations with Mr. Grannis regarding Ms. Rowe's compensation?

A. Not that I recall.

Q. Did you have any conversations with

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2 Diane Greene regarding Ms. Rowe's role?

3 A. Not that I recall.

4 Q. Did you have any conversations with

5 Diane Greene regarding Ms. Rowe's trajectory at

6 the company?

7 A. Not that I recall.

8 Q. Did you have any conversations with

9 Diane Greene regarding Ms. Rowe's performance?

10 A. No, not that I recall.

11 Q. Did you have any conversations with

12 Diane Greene regarding Ms. Rowe's compensation?

13 A. No, not that I recall.

14 Q. Did you have any conversations with  
15 anyone regarding Ms. Rowe's role at the company?

16 MR. GAGE: Objection.

17 A. Her current role? I don't think I  
18 understand that question.

19 Q. When you were there, did you have any  
20 conversations with anyone regarding Ms. Rowe and  
21 her role at the company, her job at the company?

22 MR. GAGE: Objection.

23 A. Possibly.

24 Q. Any that you recall with  
25 particularity?

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2 A. No, not particular, no.

3 Q. Did you have any -- while you were at  
4 Google, did you have any conversations with anyone  
5 regarding Ms. Rowe's performance?

6 A. No, not that I recall.

7 MR. GAGE: Objection.

8 Q. While you were at the company, did  
9 you have any conversations with anyone regarding  
10 Ms. Rowe's compensation?

11 A. Not that I recall.

12 MR. GAGE: Objection.

13 Q. Okay. Did you play any role in  
14 setting Ms. Rowe's compensation at the time of her  
15 hire?

16 A. Typically I wouldn't have.

17 Q. Typically you wouldn't have what?

18 A. Played a role in her compensation  
19 unless an exception needed to be made.

20 Q. Do you recall any of the technical  
21 directors for whom you played a role in setting  
22 their initial compensation?

23 A. No, I don't recall being involved in  
24 the compensation.

25 Q. Did you play any role in setting what

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2 Ms. Rowe's level would be?

3 MR. GAGE: Objection.

4 A. Yeah, that's a broad question. I was  
5 targeting -- you know, we were targeting Level 8  
6 hires in the CTO office, so not directly.

7 Q. Were some individuals brought in as  
8 Level 9?

9 A. Yes.

10 Q. Were you involved in the decision to  
11 bring individuals in at a Level 9?

12 A. Indirectly.

13 Q. In what way were you indirectly  
14 involved?

15 A. As the manager of Will.

16 Q. And how did that indirect involvement  
17 relate to hiring people as Level 9?

18 A. Typically I'd be the approver, the  
19 final approver.

20 Q. And so would Mr. Grannis make the  
21 recommendation with respect to what level someone  
22 should be brought in?

23 MR. GAGE: Objection.

24 A. Not independently.

25 Q. What's your understanding of how the